

EXHIBIT H1



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August 30, 2018

Via Facsimile :

Ms. Susan Sharko, Esq.
600 Campus Drive
Florham Park, New Jersey 07932-1047

RE: Follow-up on issues relating to 30(b)(6) depositions of Hicks, Nicholson, Hopkins and French.

Dear Susan,

As we indicated we would, the PSC would like to follow up on issues relating to the 30(b)(6) depositions taken to date of Hicks, Nicholson, Hopkins and French . Upon reviewing these items, please advise whether you will produce the requested information and, if not, why not. As always, we are available should you have any questions.

I. DONALD HICKS

- Despite the 30(b)(6) notice, Mr. Hicks could only testify for Quality Assurance from 2006 forward. We renew of request for J&J to produce a witness for these issues from the timeframe prior to 2006. [P. 20]
- Please produce the original mine qualification report for the Guangxi mine as requested. [P. 216-218]
- Please produce a witness for the conference identified on page 260-263 where talc testing methodologies were discussed.

II. SUSAN NICHOLSON, MD

- Please produce the cover pages for the Oct. 2000 MRG Research proposal [Nicholson Exhibit 18-Bates JNJ 00001757] and Preliminary-Meta-analysis [Nicholson Ex.21, Bates JNJ 000017613].
- Please also produce all documents surrounding this 2000 MRG proposal and talc-ovarian cancer preliminary meta-analysis beyond those identified in the deposition,

including those which would support Dr. Nicholson's supposition that the preliminary meta-analysis was performed in connection with the NTP review and any communications between Drs. Chukowski, Hopkins and Wehner and Drs. Huncharek or Muscat. In our review of the material, the only documents from 2000 that refer to that MRG meta-analysis were attached to the deposition and there is no reference in production of any defendant that supports Dr. Nicholson's supposition that this meta-analysis was performed for and/or paid for by PCPC in connection with NTP.

- Please produce the complete documents for "Talc Projects" [Nicholson 24—JNJ 000014057] and Citizens Petition Fax Nicholson 52-JNJALC000021758-62]
- Please produce a complete clean copy of March 10, 2002 fax to Bill Ashton with the attachment which was missing [Nicholson Ex 78—JNJALC000008491]
- Please produce a complete clean copy of March 26, 2002 fax to Ashton, Nicholson Exhibit 79 [JNJ 000000636-638]
- Please produce a complete clean copy of Fax to Ashton April 11, 2002 Nicholson Exhibit 84 [JNJ 000242897];
- Please produce a complete and clean copy of Fax to Ashton, April 18, 2002 [Nicholson Ex 86];
- Please disclose how much money that Meta-analysis Research Group/Huncharek/Muscat were paid [Dep Page 434]
- Please produce all documents and minutes relating to the June 2018 meeting and call with FDA [P. 766-80]
- Please produce documents which relate or refer to Dr. Nicholson's meetings with professional organizations as discussed in her deposition.
- Please produce the J&J version of Nicholson Ex 38 [IMERYYS 272262]

III. JOHN HOPKINS

- As you know, we have requested copies of the Shower to Shower and Baby Powder "Fact Books" that were testified to by Dr. Hopkins as well as the opportunity to review and inspect the originals. You have promised an identification of these documents from the J&J production and we still await this list. In addition, we have asked to inspect the originals because, to the degree any portions of these documents were previously produced, the pages were spread throughout throughout the J&J production. We want to see these entire documents.

- Please produce a copy of the database used by J&J to construct the MSDS sheets as well as all JBP/SJS MSDS sheets.
- Please produce a historical listing of chemicals used for fragrances used in JBP/STS.
- Please produce all formulas including any fragrance chemicals, additives, sterilization agents, reagents, or other additives for JBP and STS and the time periods used
- Please confirm that you have produced the entirety of Dr. Hopkins Talc related files irrespective of whether the files were domestic or foreign documents.

IV. TINA FRENCH

- Please produce the document with the search terms used by Ms. French to look for J&J Board Minutes relating to talc safety. [P. 90]
- Please produce the notes used by the witness to prepare for the deposition which she did not bring. [P. 91-92, 111, 278]
- Please produce the minutes for the 1983 Board meeting following the discussion of the talc contamination found in Taiwanese BP. [P. 300]
- Please produce the un-redacted versions of the 5 board meeting notes that Ms. French reviewed to prepare for her deposition
- For any and all Board Meetings where talc safety was discussed for which you claimed privilege, please provide a privilege log or identify where on the produced privilege logs these documents have been identified.

Again, we are happy to discuss these issues with you but we ask for your prompt reply given the current schedule.

Sincerely,

Christopher V. Tisi, Esq.

Cc: Julie Tersigni, Esq
Thomas Locke, Esq.
Michelle A. Parfitt, Esq.
P. Leigh O'Dell, Esq.
Christopher Placetella, Esq.
Mark Silver, Esq.
Richard Bernardo, Esq.